

POPIA PRIVACY NOTICE

1. Currencies Direct External Profit Company Ltd, Registration number 2011/117232/10 registered address Suit 1405, 14th Floor, Portside Building, 4 Bree Street Cape Town, 8001
2. Currencies Direct promises to treat all your personal information carefully and responsibly.
3. Personal information includes any information that lets Currencies Direct identify you, such as your name/s and surname combined with your physical address, contact details, and/or passport/identity number.
4. Personal information (in South Africa) also refers to the personal information that uniquely identifies a legal entity, such as the trading name of a company combined with the company registration number.
5. Special personal information includes that which details your race or ethnic origin, religious and philosophical beliefs, political persuasion, biometric information (for example, your voice or fingerprints) or any criminal behaviour which relates to alleged criminal offences or proceedings.
6. Personal information may be given to, or collected by Currencies Direct in writing as part of a written application form, electronically (email), telephonically and/or online www.currenciesdirect.co.za
7. Processing of personal information includes any initial processing that Currencies Direct does when we first collect your personal information. It also includes any further and ongoing processing that Currencies Direct is allowed to carry out legitimately in terms of the reasons listed in paragraph 9 (below). The term 'processing' includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying or disposing of personal information.
8. Currencies Direct will only collect and process your personal information for the reason you provided it to us, or to enable us to comply with the requirements of specific local or foreign laws that we are governed by; or to comply with any regulations, directives, judgments or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency or exchange body.
9. Currencies Direct may process your personal information to protect your or our legitimate interests. Currencies Direct will not collect and process personal information about you that we do not need for this purpose. The general purposes for which Currencies Direct collects and processes your personal information include, but are not limited to:
 - 9.1 Creating a record of you on our system to verify your identity, assess your application for products and/or services, provide you with the products and/or services you have applied for and then communicate with and keep you informed about these products and/or services;
 - 9.2 Identifying you and verifying your physical address, source of funds, income and similar information;
 - 9.3 Assessing your personal financial circumstances and needs before providing either information and/or products or services to you. In this regard, we may collect your personal information from you in your capacity as our prospective client;
 - 9.4 Any purpose related to the prevention of financial crime, including fraud detection and prevention, sanctions screening, adverse media screening, monitoring of anti-money laundering and any financing of terrorist activities;
 - 9.5 Enforcing our obligations, including without limitation the collection of amounts outstanding from you and your provision of security for banking facilities with our Partner Authorised Dealers (Banks).
 - 9.6 Further processing for historical, statistical or research purposes where the outcomes will not be published in an identifiable format;
 - 9.7 Providing income tax-related information to tax authorities;
 - 9.8 Conducting surveys to gauge client or employee sentiment or to improve our product and service offering;
 - 9.9 Where you have applied for employment at Currencies Direct or for a Currencies Direct internship/scholarship, we perform applicant screening and background checks, and such screening may include social media screening and screening relating to any information about you we may obtain from publically available sources such as search engine results;
 - 9.10 Where you are a Currencies Direct employee (including contractors), we create an employment record of you on our system to facilitate continuous monitoring during your employment with us;
 - 9.11 Where you are a Currencies Direct director, we create a record of you as a director on our system;
 - 9.12 Where you've been identified as a next of kin by an employee or customer, we create a record of you on our system; and
 - 9.13 Where you are a supplier to Currencies Direct, we process your personal information for due diligence, risk assessment, administrative and payment purposes.
10. Furthermore, Currencies Direct will not process your special personal information unless:
 - 10.1 You have consented to Currencies Direct processing it (in circumstances where we are legally obliged to obtain your consent); or
 - 10.2 It is necessary to exercise or defend a right or obligation in law; or
 - 10.3 It is necessary to comply with an international legal obligation of public interest; or
 - 10.4 It is for certain historical, research or statistical purposes that would not adversely affect your privacy; or
 - 10.5 You have deliberately made your personal information public.
11. There are some personal information fields that you have to fill in or provide if you want Currencies Direct to provide you with your chosen product and/or service or on-board you as an employee, supplier, director or job applicant. This information can be provided in writing, electronically or telephonically, but it must be accurate and complete. If Currencies Direct does not receive the necessary personal information, we will not be able to continue with your application. If you are already a Client/employee/supplier/director and Currencies Direct asks you for this information and you do not provide it, Currencies Direct will have to suspend the provision of the product and/or services for a period of time, or as the case may be, even terminate our relationship with you.

12. In most cases, personal information will be collected directly from you, but there may be other instances when Currencies Direct will collect personal information from other sources. These may include public records, places where you may already have made your personal information public (for example, on social media where your settings on such social media are set to 'public'), credit bureaus, or individuals/directors whom you have appointed as your representative, where you are a corporate entity. Currencies Direct will only collect your personal information from other sources where we are legally entitled or obliged to do so, and you are entitled to ask Currencies Direct which sources Currencies Direct used to collect your personal information.
13. For the purposes outlined in paragraph 9 (above), Currencies Direct will, in most instances, collect and process your personal information internally. However, there are times when Currencies Direct needs to outsource these functions to third parties, including parties in other countries. Where your personal information is shared internally within the Currencies Direct Group, such sharing will be carried out only for the purposes outlined in paragraph 9 (above). Currencies Direct may also need to share your personal information with external organisations, such as credit bureaus, tax authorities or other regulatory or industry bodies, so that we can meet our due diligence or regulatory requirements. We may need to share your personal information with our business partners or counter-parties, where we are involved in corporate transactions relating to the sale or transfer of any of our businesses, legal entities or assets, or to any party to whom we assign our rights under any of our agreements for particular products and services.
14. Currencies Direct will not share your personal information with third parties who do not need your personal information, or where Currencies Direct is not legally permitted to do so. When Currencies Direct decides to transfer your personal information to third parties, we will only provide it to organisations that have data privacy policies equivalent to Currencies Direct, or subject to appropriate contractual obligations, or to those who are subject to laws relating to the processing of personal information that are similar to those that apply to Currencies Direct.
15. Should you not wish to receive direct marketing communication from us, you can immediately update your preferences by getting in touch with our team via email on privacysa@currenciesdirect.com
16. As a non-customer, if you would like to know more about Currencies Direct products or services, please submit your details to us via email on infosa@currenciesdirect.com
17. We will adhere to your communication preferences whenever we can, but we may need to send you important communications via a channel that is not your preference. We will only do so in cases where we deem the information to be important and relevant for you.
18. To the extent that local legislation permits or if you are a resident of the European Union or United Kingdom, you have the following rights regarding your personal information:
 - 18.1 The right to access your personal information that we have on record. Please refer to our PAIA manual for the process to access your personal information.
 - 18.2 You have the right to ask Currencies Direct to correct any of your personal information that is incorrect. These requests must be sent to us in writing using **this form**.
 - 18.3 You can ask Currencies Direct to delete or destroy your personal information. You can also object to Currencies Direct processing your personal information. These requests must be sent to Currencies Direct in writing using **this form**.
 - 18.4 However, the result of such a request will be that Currencies Direct may have to suspend the provision of products and/or services for a period of time, or even terminate our relationship with you. Currencies Direct records are subject to regulatory retention periods, which means that Currencies Direct may not be able to delete or destroy your personal information immediately upon request.
19. If you have a complaint relating to the protection of your personal information, including the way in which it has been collected or processed by Currencies Direct, please contact us using the local contact details as listed below. If you have not had your complaint dealt with satisfactorily, you may lodge a complaint with your local privacy regulator in terms of applicable privacy laws.

INTRODUCTION

DESCRIPTION OF THE ACT

The Promotion of Access to Information Act, No 2 of 2000 ("the Act") was enacted on 3 February 2000, giving effect to the constitutional right of access to any information held by the state and any information that is held by another person and that is required for the exercise or protection of any rights. Where a request is made in terms of the Act, the body to whom the request is made is obliged to release the information, except where the Act expressly provides that the information may or must not be released. The Act sets out the requisite procedural issues attached to such request. The Act is read in conjunction with the Protection of Personal Information Act 4 of 2013.

PURPOSE

This manual is intended to foster a culture of transparency and accountability within the Financial Services Industry as a whole, by giving effect to the right to information that is required for the exercise or protection of any right and to actively promote a society in which the people of South Africa have effective access to information to enable them to more fully exercise and protect their rights.

In order to promote effective governance of private bodies, it is necessary to ensure that everyone is empowered and educated to understand their rights in terms of the Act in order for them to exercise their rights in relation to public and private bodies.

Section 9 of the Act however recognises that such right to access information cannot be unlimited and should be subject to justifiable limitations, including, but not limited to:

- Limitations aimed at the reasonable protection of privacy;
- Commercial confidentiality; and
- Effective, efficient and good governance;
- and in a manner which balances that right with any other rights, including such rights contained in the Bill of Rights in the Constitution.

This manual sets out to provide a generic manual to the Financial Services Industry to deal with the requests in a conforming manner, which will enable the requestors to obtain the records which they are entitled to in a quick,

easy and accessible manner. This manual may be adapted by the individual role players in the Financial Services Industry to specifically meet their needs. Provisions of sections 18 and 53 of the Act apply to requests made in terms of section 23 of the Protection of Personal Information Act.

Wherever reference is made to "institution" in this manual, it will refer to the private bodies within the Financial Services Industry, for whom this manual is drafted. This manual has been drafted in accordance with the generic manual for the Financial Services Industry, which has been submitted to the Human Rights Commission by the Compliance Institute of South Africa, of which this body is a member.

CONTACT DETAILS

Information Officer

Gareth Frye

Suit 1405, 14th Floor, Portside Building, 4 Bree Street, Cape Town, 8001

Tel: +27 (21) 418 0105

E-Mail: privacysa@currenciesdirect.com

Deputy Information Office

Nelmie Ross

Suit 1405, 14th Floor, Portside Building, 4 Bree Street, Cape Town, 8001

Tel: +27 (21) 418 0105

E-Mail: privacysa@currenciesdirect.com

Guide of SA Human Rights Commission

Enquiry Details

The guide will contain such information as may reasonably be required by a person who wishes to exercise any right contemplated in the Act. Any enquiries regarding this guide should be directed to:

The South African HUMAN RIGHTS COMMISSION, at PAIA Unit (THE RESEARCH AND DOCUMENTATION DEPARTMENT),

Private Bag X2700, HOUGHTON, 2041;

Telephone Number: (011) 877 3600;

Facsimile Number: (011) 403 0625

Website: www.sahrc.org.za

E-Mail Address: paia@sahrc.org.za

It is recorded that the accessibility of the documents listed herein below, may be subject to the grounds of refusal set out hereinafter.

The information is classified and grouped according to records relating to the following subjects and categories:

Personnel Records

- Personal records provided by personnel.
- Records provided by a third party relating to personnel.
- Conditions of employment and other personnel-related contractual and quasi-legal records.
- Internal evaluation records and other internal records.
- Correspondence relating to personnel.
- Training schedules and material.

"Personnel" refers to any person who works for, or provides services to or on behalf of Currencies Direct, and receives or is entitled to receive remuneration and any other person who assists in carrying out or conducting the business of Currencies Direct. This includes, without limitation, directors (executive and non-executive), all permanent, temporary and part-time staff, as well as contract workers.

Client Related Records

- Records provided by a Client to a third party acting for or on behalf of Currencies Direct;
- Records provided by a third party;
- Records generated by or within Currencies Direct relating to its Clients, including transactional records.

A "client" refers to any natural or juristic entity that receives services from Currencies Direct.

Private Body Records

- Financial records;
- Operational records;
- Databases;
- Information Technology;
- Marketing records;
- Internal correspondence;
- Product records;
- Statutory records;
- Internal Policies and Procedures;
- Treasury-related records;
- Records held by officials of the institution.

These records include, but are not limited to, the records which pertain to Currencies Direct own affairs.

Records available in accordance with South African legislation

Currencies Direct holds records in terms of legislation as detailed herein below.

Other Party Records

- Personnel, clients or private body records which are held by another party, as opposed to the records held by Currencies Direct itself;
- Records held by Currencies Direct pertaining to other parties, including without limitation, financial records, correspondence, contractual records, records provided by the other party, and records third parties have provided about the contractors/ suppliers.

Currencies Direct may possess records pertaining to other parties, including without limitation contractors, suppliers, subsidiary/holding/sister companies, joint venture companies, and service providers. Alternatively, such other parties may possess records that can be said to belong to Currencies Direct.

REFUSAL OF ACCESS TO RECORDS

Grounds to Refuse Access

The main grounds for Currencies Direct to refuse a request for information relates to the:

- Mandatory protection of the privacy of a third party who is a natural person/ juristic, which would involve the unreasonable disclosure of personal information of that natural person/ juristic;
- Mandatory protection of the commercial information of a third party, if the record contains:
 - trade secrets of the third party;

- financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of that third party;
- information disclosed in confidence by a third party to Currencies Direct, if the disclosure could put that third party at a disadvantage in negotiations or commercial competition;
- Mandatory protection of confidential information of third parties if it is protected in terms of any agreement;
- Mandatory protection of the safety of individuals and the protection of property;
- Mandatory protection of records which would be regarded as privileged in legal proceedings;

The commercial activities of Currencies Direct, which may include:

- trade secrets of Currencies Direct;
- Financial, commercial, scientific or technical information which disclosure could likely cause harm to the financial or commercial interests of Currencies Direct;
- Information which, if disclosed could put Currencies Direct at a disadvantage in negotiations or commercial competition;
- A computer program which is owned by Currencies Direct, and which is protected by copyright.
- The research information of Currencies Direct or a third party, if its disclosure would disclose the identity of Currencies Direct, the researcher or the subject matter of the research and would place the research at a serious disadvantage.

Requests for information that are clearly frivolous or vexatious, or which involve an unreasonable diversion of resources shall be refused.

Section 23(4)(a) of the Protection of Personal Information Act applies the same grounds to refuse access.

REMEDIES AVAILABLE WHEN CURRENCIES DIRECT REFUSES A REQUEST

Internal Remedies

Currencies Direct does not have internal appeal procedures. As such, the decision made by the Information Officer is final, and requestors will have to exercise such external remedies at their disposal if the request for information is refused, and the requestor is not satisfied with the answer supplied by the Information Officer.

External Remedies

A requestor that is dissatisfied with the Information Officer's refusal to disclose information, may within 30 days of notification of the decision, apply to a Court for relief.

Likewise, a third party dissatisfied with the Information Officer's decision to grant a request for information, may within 30 days of notification of the decision, apply to a Court for relief. For purposes of the Act, the Courts

that have jurisdiction over these applications are the Constitutional Court, the High Court or another court of similar status.

REQUEST PROCEDURE

Procedural Requirements

The requester must comply with all the procedural requirements contained in the Act relating to the request for access to a record.

The requester must complete the prescribed form enclosed herewith, and submit same, if applicable to the Information Officer or the Deputy Information Officer at the physical address, or electronic mail address as stated above.

The prescribed form must be filled in with enough to at least enable the Information Officer to identify:

- The record or records requested;
- The identity of the requester,
- Which form of access is required, if the request is granted;
- The postal address or fax number of the requester.

The requester must state that they require the information in order to exercise or protect a right, and clearly state what the nature of the right is so to be exercised or protected. In addition, the requester must clearly specify why the record is necessary to exercise or protect such a right.

Currencies Direct will process the request within 30 days, unless the requester has stated special reasons which would satisfy the Information Officer that circumstances dictate that the above time periods not be complied with.

The requester shall be informed whether access is granted or denied in writing. If, in addition, the requester requires the reasons for the decision in any other manner, they must state the manner and the particulars so required.

If a request is made on behalf of another person, then the requester must submit proof of the capacity in which the requester is making the request to the reasonable satisfaction of the Information Officer.

If an individual is unable to complete the prescribed form because of illiteracy or disability, such a person may make the request orally.

If an information officer fails to give the decision on a request for access to the requestor concerned within 30 days, the information officer is regarded as having refused the request.

DECISION

Time Allowed to Institution

Currencies Direct will, within 30 days of receipt of the request, decide whether to grant or decline the request and give notice with reasons (if required) to that effect.

The 30 day period with which Currencies Direct has to decide whether to grant or refuse the request, may be extended for a further period of not more than thirty days if the request is for a large number of information, or the request requires.

Currencies Direct will notify the requester in writing should an extension be sought.